

105 Decker Ct  
Suite 1150 11th Floor  
Irving, TX 75062  
(214) 855-9200

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION

IN RE:  
**DANIELLE VERONICA SAVOY**  
DEBTOR

CASE NO: 24-30209-MVL-13  
Pre-Hearing: 06/06/2024  
Time: 8:30 am

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**Motion to Dismiss Chapter 13 Case or in the Alternative Reduce Attorney Fees for  
Failure to Confirm and Notice of Hearing thereon**

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TO THE HONORABLE U.S. BANKRUPTCY JUDGE:

Now comes Thomas D. Powers, Dallas and files this Motion pursuant to Section 1307 (c) of the Bankruptcy Code and Fed.Rules Bankr.Proc. 9014, 11 USCA and would respectfully show unto the Court as follows:

This case should be dismissed or in the alternative, attorney fees reduced for one or more of the following causes:

- ( X ) Failure to Obtain Confirmation.  
( X ) Confirmation has been denied.

Wherefore, your Trustee prays that after notice and hearing, this Chapter 13 case be dismissed or in the alternative reduce attorney fees, and for such other and further relief as this Court deems just and proper.

Respectfully submitted,

Thomas D. Powers, the Chapter 13 Trustee

By: /s/ Thomas D. Powers

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Thomas D. Powers / State Bar No. 16218700  
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**Motion to Dismiss Chapter 13 Case or in the Alternative Reduce Attorney Fees for Failure to Confirm and Notice of Hearing thereon, Page 2**  
**Case # 24-30209-MVL-13**  
**DANIELLE VERONICA SAVOY**

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**NOTICE OF HEARING**

You are notified of the filing of the foregoing Motion of Trustee to Dismiss Chapter 13 case for the reason (s) therein stated. A pre-hearing conference on the Trustee's Motion will be held on **06/06/2024**. Due to the Covid pandemic Debtor's Counsel must initiate the pre-hearing conference by contacting the Trustee or his staff attorney **no later than 4:00 P. M.** on 06/05/2024. Motions not resolved/defaulted at the pre-hearing conference will be held by the Court on 06/06/2024 by Webex beginning at 2:00 P.M..

You may access the Webex Hearings at the following:

**Judge Larson - <https://us-courts.webex.com/meet/larson>**

**Access Webex Instructions at <https://www.txnb.uscourts.gov/judges-info/hearing-dates/judge-larson-hearing-dates>.**

You do not have to attend the pre-hearing conference or hearing unless you oppose dismissal of the case.

**Certificate of Service**

I hereby certify that a true copy of the foregoing Motion to Dismiss Chapter 13 Case and Notice of Hearing thereon was served on the following parties at the addresses listed below by United States First Class Mail or via electronic mail:

Debtor: Danielle Veronica Savoy, 100 N Park Rd, Unit 1125, Reading, Pa 19610  
Attorney: Leinart Law Firm, 10670 N Central Expressway, Suite 320, Dallas, Tx 75231\*\*  
Notice Creditor(s): Ais Portfolio Services Lp, Ally Bank Department, 4515 N Santa Fe Ave Dept Aps, Oklahoma City, Ok 73118  
Gray Reed & Mcgraw, 1601 Elm St Suite 4600, Dallas, Tx 75201  
Megan F Clontz, Spencer Fane, 5700 Granite Pkwy, Ste 650, Plano, Tx 75024  
Ritcheson Lauffer & Vincent Pc, 821 Ese Loop 323 Suite 530, Tyler, Tx 75701\*\*

\*\*Indicates party has elected to receive all notifications via electronic service and was not served a copy via United States First Class Mail.

Dated: 4/9/2024

By: /s/ Thomas D. Powers  
Thomas D. Powers